

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEW ENGLAND COMPOUNDING )  
PHARMACY, INC. PRODUCTS LIABILITY ) MDL No. 02419  
LITIGATION ) Docket No. 1:13-md-2419-RWZ  
\_\_\_\_\_  
\_\_\_\_\_  
This document relates to: )  
\_\_\_\_\_  
All of the cases against the Box Hill Defendants<sup>1</sup> )  
\_\_\_\_\_  
\_\_\_\_\_)

**NOTICE OF SERVICE OF DISCOVERY**

Defendants Box Hill Surgery Center, L.L.C., Ritu T. Bhambhani, M.D., and Ritu T. Bhambhani, M.D., L.L.C. (hereinafter, collectively “Box Hill Defendants”) give notice to the Court that they have served written discovery in the form of Interrogatories, Requests for Production of Documents, and Requests for Admission on the following parties, respectively, through the below listed counsel on July 30, 2015, via U.S. Mail, postage pre-paid:

1. UniFirst Corporation

Damian W. Wilmot  
James Rehnquist  
Abigail K. Hemani  
Roberto M. Braceras  
Goodwin Procter, LLP  
Exchange Place  
53 State Street  
Boston, MA 02109  
*Attorneys for UniFirst Corporation  
d/b/a Uniclean Cleanroom Services*

---

<sup>1</sup> This pleading applies to the following cases: Handy v. Box Hill Surgery Center, LLC, et al. No: 1:14-cv-14019-RWZ; Armetta v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14022-RWZ; Torbeck v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14023-RWZ; Kashi v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14026-RWZ; Bowman v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14028-RWZ; Dreisch v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14029-RWZ; Davis v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14033-RWZ; Farthing v. Box Hill Surgery Center, LLC, et al. No. 1:14-cv-14036-RWZ

2. Liberty Industries, Inc.

Nicole D. Dorman  
Law Offices of Nicole D. Dorman  
P.O. Box 1142  
Glastonbury, Connecticut 06033  
*Counsel for Liberty Industries, Inc.*

3. Medical Sales Management, Inc.

Daniel M. Rabinovitz  
Brady J. Hermann  
Nicki Samson  
Michaels Ward & Rabinovitz  
One Beacon Street, 2<sup>nd</sup> Floor  
Boston, MA 02108  
*Attorneys for Defendant Medical  
Sales Management, Inc.*

The Box Hill Defendants attach as a collective exhibit to this Notice, this written discovery so as to ensure that all parties in the MDL are served a copy. This has been filed electronically through the Court's CM/ECF system to ensure that all interested parties receive a copy of this Notice and its attachment.

Respectfully submitted,

/s/ Gregory K. Kirby  
Gregory K. Kirby  
Pessin Katz Law, P.A.  
901 Dulaney Valley Road, Suite 500  
Towson, Maryland 21204  
(410) 938-8800  
*Attorneys for the Box Hill Surgery Center, LLC,  
Ritu Bhambhani, M.D., and Ritu T. Bhambhani,  
M.D., LLC*